



**Class 3 Permit Modification Request
to the
Pueblo Chemical Depot
Hazardous Waste Permit
Permit No. CO-02-08-08-01
EPA ID No. CO8-213-820-725**

September 2013

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The Joint Project Manager Elimination (Provisional) is tasked with augmenting planned destruction of the Pueblo Chemical Depot (PCD) chemical weapon stockpile by providing and operating the Pueblo Chemical Agent-Destruction Pilot Plant (PCAPP) Explosive Destruction System (EDS) at PCD, Colorado.

Two EDS units will be deployed to treat/destroy overpacked munitions, Department of Transportation (DOT) cylinders, and other miscellaneous items (ignition cartridges, propellant) currently stored at PCD that contain mustard agents (distilled sulfur mustard [HD]/mustard-T mixture [HT]), as well as to treat/destroy any reject chemical agent munitions or contaminated bursters generated from the PCAPP operations.

The EDS units will be deployed to support the overall goals of (1) completing the destruction of the PCD inventory of chemical agent munitions and other items in compliance with the Chemical Weapons Convention (CWC) and Public Law, (2) maintaining the continuity of U.S. chemical destruction operations, and (3) conducting the treatment/destruction activities in a safe, environmentally acceptable, and cost-effective manner.

A Container Storage Unit (CSU) located within the PCAPP EDS site fence line will be used to store items pending treatment in an EDS unit.

This permit modification request to the PCD Hazardous Waste Permit CO-02-08-08-01 contains information for EDS hazardous waste operations and CSU container storage at PCD and addresses only the PCAPP EDS site operations. Other hazardous waste operations at PCD are governed by other applications and/or permits; however, where applicable, PCD permits and documentation are referenced herein.

The EDS units are considered miscellaneous treatment units and the CSU is considered a container storage unit. There will be no permitted hazardous waste tank storage, incineration, land disposal, waste piles, or containment building units at the PCAPP EDS site; therefore, permit modification headings pertaining to these hazardous waste management unit types are not applicable and are noted as such.

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4		
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ACRONYMS/ABBREVIATIONS

1		
2		
3		
4	ACWA	Assembled Chemical Weapons Alternatives
5	AED	automated external defibrillator
6	AFS	Air Filtration System
7	AFSS	Advanced Fragment Suppression System
8	ASME	American Society of Mechanical Engineers
9		
10	CAIRA	Chemical Accident/Incident Response and Assistance
11	CCR	Code of Colorado Regulations
12	CDPHE	Colorado Department of Public Health and Environment
13	CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
14	cfm	cubic feet per minute
15	CFR	Code of Federal Regulations
16	CLA	Chemical Limited Area
17	CPR	cardiopulmonary resuscitation
18	CSU	Container Storage Unit
19	CWC	Chemical Weapons Convention
20	CWM	chemical warfare materiel
21		
22	DA Pam	Department of the Army Pamphlet
23	DAAMS	Depot Area Air Monitoring System
24	DMS	Data Management System
25	DoD	Department of Defense
26	DOT	Department of Transportation
27		
28	EA	Environmental Assessment
29	ECBC	Edgewood Chemical Biological Center
30	EDS	Explosive Destruction System
31	EE	Environmental Enclosure
32	EOD	explosive ordnance disposal
33		
34	g/lb	gram per pound
35	g/mL	gram per milliliter

1	GB	sarin
2	GPL	general population limit
3	GTR	German Traktor Rocket
4		
5	HAZCOM	hazard communications
6	HAZWOPER	Hazardous Waste Operations and Emergency Response
7	HD	distilled sulfur mustard
8	HDPE	high density polyethylene
9	HEGA	high efficiency gas absorber
10	HEPA	high efficiency particulate air
11	HT	mustard-T mixture
12		
13	IDLH	immediately dangerous to life and health
14	ISCP	Installation Spill Contingency Plan
15		
16	JPM E (P)	Joint Project Manager Elimination (Provisional)
17		
18	kPa	kilopascal
19	kW	kilowatt
20		
21	LDR	Land Disposal Restriction
22		
23	MARB	Materiel Assessment Review Board
24	MEA	monoethanolamine
25	mg/L	milligram per liter
26	MIF	Mobile Igloo Filter
27	mL/gal	milliliter per gallon
28		
29	NaOCl	sodium hypochlorite
30	NEC	National Electrical Code
31	NELAP	National Environmental Laboratory Accreditation Program
32	NEPA	National Environmental Policy Act
33	NEW	net explosive weight
34	NRC	National Response Center
35	NRT	near real-time

1	OC	Operations Center
2	OSC	On-Scene Coordinator
3	OSHA	Occupational Safety and Health Administration
4	OSIC	On-Scene Installation Commander
5		
6	P2A	Phase 2 Unit A
7	P2R	Phase 2 Unit R
8	PCAPP	Pueblo Chemical Agent-Destruction Pilot Plant
9	PCB	polychlorinated biphenyl
10	PCD	Pueblo Chemical Depot
11	PDS	Personnel Decontamination Station
12	PEIS	Programmatic Environmental Impact Statement
13	PMNSCM	Project Manager for Non-Stockpile Chemical Materiel
14	ppb	parts per billion
15	PPE	personal protective equipment
16	ppm	parts per million
17	ppmw	parts per million by weight
18	psi	pounds per square inch
19		
20	QA/QC	quality assurance/quality control
21		
22	RCRA	Resource Conservation and Recovery Act
23		
24	SCBA	self-contained breathing apparatus
25	SDS	spent decontamination solution
26	SHO	Safety and Health Officer
27	SIC	sulfur-impregnated carbon
28	SME	subject matter expert
29	SOP	Standing Operating Procedure
30	STEL	short-term exposure limit
31	SWMU	solid waste management unit
32		
33	TC	toxicity characteristic
34	TCLP	Toxicity Characteristic Leaching Procedure

PCAPP EDS RCRA Modification

Date: October 2013

Revision No. 0

1	TNT	trinitrotoluene
2	TSDF	treatment, storage, and disposal facility
3		
4	UN	United Nations
5	USEPA	U.S. Environmental Protection Agency
6	UMSC	universal munition storage container
7		
8	VSL	vapor screening level

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